UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA 24-CR-89 (JWB/LIB)

United States of America,)	
)	
Plaintiff,)	DEFENDANT'S MOTION TO
)	AMEND CONDITIONS OF
V.)	PRETRIAL RELEASE
)	
John David Degelau,)	
)	
Defendant.)	
******	*****	*****

The defendant, John David Degelau, through and by his lawyers, Paul Engh and Garrett Gondik, moves the Court for an Order amending the conditions of his pretrial release. Our grounds are these:

- 1. On April 4, 2024, this Court released Mr. Degelau on conditions, among them that his travel be restricted "to within 50 miles" of his approved residence, except for conferences with counsel, "or as may otherwise be preapproved by Pretrial Services." Order at p. 2, para. 7(f). A curfew was also imposed. Para. 7(p).
- 2. Mr. Degelau has been compliant in all ways.
- 3. He requests the Court's permission to stay with his parents at the family

cabin located on Lake Vermillion, near Cook, Minnesota, which is more than 50 miles away from Duluth. Pretrial Services has taken the position that, without an amended Order, Mr. Degelau could visit the cabin, but would have to return to Duluth each night by curfew. An amended Order would permit him to stay overnight at the family cabin when his parents are there.

- 4. Mr. Degelau also seeks permission for an overnight trip to Minneapolis to see his grandfather (98 years old), on May 10th and 11th, for two nights.
 Maintaining connections with his family is important to Mr. Degelau.
- 5. Finally, Mr. Degelau requests an amendment granting permission to attend a forensic evaluation in the Twin Cities, to be scheduled by the defense retained examiner, who has an office separate from Mr. Engh.

Dated: May 2, 2024 Respectfully submitted,

/s/ Paul Engh

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